BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking on the Commission's Own Motion to Assess and Revise the Regulation of Telecommunications Utilities.	Rulemaking 05-04-005
Rulemaking for the Purposes of Revising General Order 96-A Regarding Informal Filings at the Commission.	Rulemaking 98-07-038

COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA (U 1001 C) ON THE PROPOSED DECISION OF COMMISSIONER CHONG CONSOLIDATING PROCEEDINGS, CLARIFYING RULES FOR ADVICE LETTERS UNDER THE UNIFORM REGULATORY FRAMEWORK, AND ADOPTING PROCEDURES FOR DETARIFFING

Michael D. Sasser
Gregory L. Castle
525 Market Street, 20th Floor
San Francisco, California 94105
Phone: (415) 778-1481
Fax: (415) 974-1999
E-mail: michael.sasser@att.com

Attorneys for Pacific Bell Telephone Company

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Pacific Bell Telephone Company ("AT&T California") provides its comments on the Proposed Decision of Commissioner Chong Consolidating Proceedings, Clarifying Rules For Advice Letters Under The Uniform Regulatory Framework, And Adopting Procedures For Detariffing ("Proposed Decision"), pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure.

I. INTRODUCTION

The Proposed Decision continues the great strides begun by the Commission's Phase 1 decision in this proceeding ("URF Decision")[1] to create a regulatory framework for telecommunications carriers that recognizes and meets the changing needs of the competitive telecommunication marketplace of today and tomorrow. Detariffing of services and establishing a streamlined advice letter process for services that remain tariffed facilitates innovation and competition in the marketplace. At the same time, the Proposed Decision is mindful of consumers' needs. By requiring terms and conditions of detariffed services to be posted on company websites and giving consumers the right to request written terms and conditions over the phone, the Proposed Decision ensures consumers will have the information they need to make informed decisions about which services they want to purchase and from which carrier.

While AT&T California does not agree with every position taken in the Proposed Decision, it has limited its comments below to only a few items in the Proposed Decision that need correction or clarification in the final decision.

[1] *Re Rulemaking to Assess and Revise the Regulation of Telecommunications Utilities*, Decision No. 06-08-030, *Opinion*, 2006 WL 2527822 (Cal.P.U.C. Aug. 24, 2006).

II. THE PROPOSED DECISION SHOULD CLARIFY WHAT ADVICE LETTER PROCEDURES APPLY TO FLEXIBLY PRICED SERVICES PROVIDED BY URF CARRIERS THAT WERE NOT WITHIN THE SCOPE OF PHASE 1.

When taken together, the Proposed Decision and the proposed telecommunications industry rules for General Order ("GO") 96-B are unclear as to what advice letter procedures apply to flexibly priced services that were not at issue in Phase 1 of this proceeding. Ordering Paragraph 1 of the Proposed Decision, for example, would allow an URF carrier to file an advice letter pursuant to General Rule 7.3.3 (Tier 1 treatment) under General Order 96-B for the following services:

a. Changes to retail service offerings other than basic service

b. Promotional offerings, bundles, new services

c. Withdrawal of services other than basic residential (1MR and 1FR) and basic business (1MB) services where withdrawal of service would raise public safety issues.[2]

Ordering Paragraph 1 does not address services such as special access services and switched access services that were beyond the scope of Phase 1.

Proposed General Order 96-B, Industry Rule 7.1, on the other hand, states in pertinent part:

> The following matters may be filed under Tier 1:
> . . .
> (5) A change by an URF Carrier to a rate, charge, term, or condition of *a regulated service other than Basic Service or Resale Service.*[3]

Special access services and switched access services are regulated services other than Basic Service and Resale Service as those terms are defined in General Order 96-B,

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[2] Proposed Decision, p. 73 (Ordering Paragraph 1).

[3] Proposed Decision of Commissioner Chong Adopting Telecommunications Industry Rules, Appdx. A, p. 9 (July 23, 2007).

Industry Rules 1.1 and 1.10.[4] Taken literally, this rule would allow AT&T California to use Tier 1 advice letters to make changes to access services and other services beyond the scope of the URF Decision.

The Commission should eliminate this apparent inconsistency so that URF carriers can be sure they are using the appropriate advice letter process for access services and other services beyond the scope of the URF Decision. The Proposed Decision may very well have intended that the Tier 1 process apply to these services, since they had either full pricing flexibility (Category 3) or partial pricing flexibility (Category 2) under NRF categorization. Tier 1 treatment would logically apply to those services as it does to services with pricing flexibility under URF.

If the Proposed Decision did not intend for URF carriers to use the Tier 1 process for flexibly priced services outside the scope of Phase 1, the Proposed Decision should make that clear. In that case, however, the Proposed Decision should not relegate these services to either the Tier 2 or Tier 3 advice letter processes.[5] Under the Tier 2 process, advice letters are effective only after approval by staff, but if there is no protest and no action by the staff within 30 days, they are deemed approved, as in the case of Tier 1

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[4] Industry Rule 1.1 provides: "'Basic Service' means the service elements, as described in Decision 96-10-066 (Appendix B, Part 4) and as is modified from time to time by the Commission, that a provider of local exchange service must offer to each residential customer who requests local exchange service from the provider." Access and other wholesale services are not provided to residential customers. Industry Rule 1.10 provides: "'Resale Service' means a tariffed service that a carrier offers to another carrier for resale." Access services are offered to other carriers for use along with other functions provided by that carrier to provide service to customers, but the other carrier does not simply resell the access service provided by AT&T California.

[5] As currently written the GO 96-B rules would appear to put advice letters related to these services in Tier 3, the default tier, since they are not expressly covered by Tier 2. *See* Proposed Decision of Commissioner Chong Adopting Telecommunications Industry Rules, Appdx. A, p. 11, Rule 7.3(1).

advice letters. [6] Tier 3 is even more restrictive by allowing advice letters to go into effect only after approval by Commission resolution.[7]

The Tier 2 and Tier 3 processes are substantially slower and more restrictive than the current process for services that were categorized as Categories 3 and 2 services prior to URF. For example, rates for Category 3 services (services the Commission found fully competitive even before URF) can be increased or decreased as follows:

- If the new rates are below the approved maximum level, increases or decreases are *effective on one-day notice*, and the *changed rates are not subject to protest*.
- Decreases in the maximum levels are temporarily effective on one-day notice and permanent on the 20th day after filing, if not protested.
- Increases in the maximum level of less than 5% are temporarily effective on five-day notice and permanent on the twentieth day after filing, if not protested.
- Increases in maximum levels of 5% or greater are effective on 30-day notice, permanently if no protest were entered, temporarily if a timely protest were filed.
- Changes in maximum levels that are protested would result in temporary tariffs until the protest was either withdrawn or resolved. If the protest were not withdrawn or resolved, the rate would revert to its previous level.[8]

Even the process for certain price changes to former Category 2 services is faster and less restrictive than the Tier 2 and Tier 3 processes. For example, rather than waiting for a Commission resolution (Tier 3) or a full 30-day period (Tier 2) to make price changes, Category 2 price reductions at or above the price floor become effective on five days' notice.[9]

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6 Proposed Decision, p. 18.
7 *Id*.
8 *See* Resolution T-15139, pp. 5-6 (Mar. 24, 1993) (emphasis added).
9 *See*, *e.g.*, *Re Pacific Bell*, Decision No. 00-05-020, *Opinion*, 2000 WL 1022299 (Cal.P.U.C. May 4, 2000), *mimeo*, p. 2.

In its URF Decision, the Commission found that in a fast-moving technology space like telecommunications, "there is no public interest in maintaining an outmoded tariffing procedure that requires the burdensome regulatory review of cost data and delays the provision of services…to customers.[10] While the URF Phase 1 proceeding did not examine access services, there is absolutely no reason in light of the Commission's finding above to believe the Commission intended to infuse more delay into the process of changing rates for those services than existed before the URF decision. The Commission should clarify, therefore, that either it intended to apply the Tier 1 process to flexibly priced services beyond the scope of the URF Decision or that the advice letter procedures applicable to those services prior to the URF Decision still apply.

III. THE DETARIFFING PROCEDURES ESTABLISHED IN THIS PROCEEDING SHOULD APPLY TO IXCs.

The Proposed Decision allows parties to comment on whether the detariffing procedures established in this proceeding should apply to IXCs and supersede existing procedures adopted by the Commission.[11] The Commission already has made the necessary findings to allow, and has in fact allowed, IXCs to detariff. The question for this proceeding is simply whether IXCs should be subject to the same terms and conditions for detariffing as ILECs and CLECs will be at the conclusion of this proceeding.

[10] D.06-08-030, *mimeo*, pp. 182-183.
[11] Proposed Decision, pp. 60, 74 (Ordering Paragraph 5).

The answer to that question can only be yes. In the URF Decision, the Commission emphasized the importance of establishing consistent policies under its uniform regulatory framework:

> We will ensure that all telecommunications rules, policies, and directives are implemented by the carriers and Commission Staff consistent with principles articulated in this decision. To the extent permitted by this decision, *we will seek to ensure that we act in a competitively and technologically neutral manner*.[12]

To ensure competitive and technological neutrality, all competitive carriers -- URF ILEC, CLEC, and IXC – should be subject to the same detariffing rules.

IV. THE COMMISSION SHOULD CLARIFY THAT CARRIERS ARE NOT REQUIRED TO TARIFF ALL OBLIGATIONS MANDATED BY STATE OR FEDERAL LAW.

The Proposed Decision would direct staff to approve a request for detariffing, provided the advice letter is otherwise in compliance with GO 96-B and the Commission's rules and does not propose to cancel certain specified tariffs, including a tariff that contains obligations pursuant to Carrier of Last Resort obligations or "other obligations under state or federal law."[13] This language referencing "other obligations under state or federal law." is vague and, hence, subject to misinterpretation; it should be clarified.

AT&T California, like all businesses in California, is subject to the requirements of a myriad of federal and state laws. While AT&T California of course will abide by these laws, these legal requirements need not necessarily be contained in tariffs. They are

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[12] D.06-08-030, *mimeo*, pp. 251-252 (emphasis added).
[13] Proposed Decision, 73-74 (Ordering Paragraph 3); *see also id.* at 51-52, 72 (Conclusion of Law 27).

contained in various federal and state codes, which are accessible to the public. No purpose is served, therefore, by repeating those requirements in tariffs. The only time such a requirement would need to appear in a tariff is if the federal or state law itself mandated that the requirement must be contained in a tariff. The Proposed Decision should be clarified accordingly.

V. THE THREE-YEAR WEBSITE POSTING REQUIREMENT FOR OUTDATED SERVICE RATES, TERMS, AND CONDITIONS IS UNNECESSARY.

The Proposed Decision requires carriers to post on a website their current generally available rates, terms, and conditions for services.[14] The Proposed Decision also would require carriers to make available on their websites a three-year archive of their retail rates (both tariffed and detariffed), with dates of effectiveness and geographic applicability clearly delineated.[15] Proposed General Order 96-B, Industry Rule 5.2, similarly requires the carrier "publish at its Internet site an archive of its canceled rates, charges, terms, and conditions, going back three years or to the date of detariffing, whichever is more recent."[16] The Proposed Decision does not provide any rationale for establishing this "archive" requirement. While the intention of such a requirement may have been provide useful information, it does not reasonably accomplish that objective.

It makes sense to require website posting of *current* rates, terms, and conditions of service. Customers and prospective customers can use this information to compare service offerings of various carriers and, once they have decided upon a carrier, know

[14] *Id.* at 38, 66-67 (Finding of Fact 20).
[15] *Id.* at 38, 67 (Finding of Fact 20).
[16] Proposed Decision of Commissioner Chong Adopting Telecommunications Industry Rules, Appdx. A, p. 7.

the specifics of the service they are ordering and its price. An archive of superseded information obviously would not be useful for this purpose.

Posting outdated rates, terms, and conditions creates a substantial risk of customer confusion. Despite efforts to make the website clear, it is inevitable that some customers inadvertently will confuse outdated rates, terms, and conditions as being current and waste their valuable time comparing that information with information of other carriers and making decisions based on invalid information. That risk might be worth accepting if the demand for such information was significant. In AT&T California's experience, however, it is rare that customers want or need this type of outdated information.

Additionally, maintaining an on-line database of outdated rates, terms, and conditions is inefficient and burdensome. While the Proposed Decision does not provide any rationale for posting archived information, in the event the Commission intended that customers have access to the outdated information to prosecute a dispute with a carrier, that information can be made available to customers in a manner other than on the carrier's public website. The rare customer who wants outdated information can simply call AT&T California and speak to a representative who would assist the customers and mail (or if requested, email) the information to the customer. It is more efficient from a carrier's standpoint to respond to such requests on an exception basis rather than continually maintain and update that information on a website. For both of these reasons, the Proposed Decision's website archive requirement should be eliminated and carriers instead required to maintain records of superseded rates, terms, and conditions

of service for three years and provide that information to customers at no charge upon request.

VI. THE COMMISSION SHOULD CLARIFY THAT 30 DAY PRIOR NOTICE APPLIES TO RATE *INCREASES* AND *MORE RESTRICTIVE* TERMS OR CONDITIONS FOR DETARIFFED SERVICES.

The Proposed Decision requires 30-day prior notice of any rate *increases* or *more restrictive* terms and conditions for detariffed services, and it applies the same requirement to term contracts for detariffed services. Conclusion of Law 23 specifies that the carrier must notify a customer 30 days in advance of any "increased rates, or more restrictive terms and conditions . . . ."[17] Similarly, the Proposed Decision states on page 38 that "if a carrier incorporates by reference rates, terms or conditions into a term contract for detariffed services, we will require that carrier to provide 30-day notice to its customers of any increase to rates, or more restrictive terms or conditions . . . ."[18] Thus, the Commission's intent is to require 30-day notice prior to rate *increases* or *more restrictive* terms and conditions.[19]

Elsewhere, however, the Proposed Decision does not make clear that the notice requirement applies only when the change is a rate *increase* or the term or condition is *more restrictive*, leaving open the possibility of misinterpretation. On pages 46-47, the Proposed Decision requires carriers that have detariffed services to provide 30-day notice to customers prior to "changes to terms and conditions." Similarly, page 47 of the

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[17] Proposed Decision, p. 72. General Order 96-B, Rule 5.3, similarly specifies that the 30-day notice applies to "a higher rate or change, or more restrictive term or condition . . . ." Proposed Decision of Commissioner Chong Adopting Telecommunications Industry Rules, Appdx. A, p. 7.

[18] Proposed Decision, p. 38.

[19] This notice requirement for detariffed services is consistent with the notice requirement for URF tariffed services, which similarly applies to rate *increases* or *more restrictive* terms or conditions. *See id.* at 14 fn. 27.

Proposed Decision states that carriers offering detariffed services in a term contract are to provide notice before "changing any rates, terms, or conditions to such term contract."[20] Conclusion of Law 13 states that 30 day notice is required when the carrier and customer enter into a term contract, 30 day notice is respond to "change rates, terms, or conditions to the term contract . . . ."[21] Thus, the Proposed Decision is not consistent in making clear that the 30-day notice requirement applies only when a change in rates is a rate *increase*, and when the change to a term or condition makes it *more restrictive*.

To remove any doubt about the Commission's intent, the Proposed Decision should clearly state that the 30-day notice requirement for a change to the rate, term, or condition of a detariffed service or a term contract offering detariffed services applies only where the change is a rate *increase* or *more restrictive* term or condition.

VII. THE COMMISSION SHOULD ALLOW CARRIERS AND BUSINESS CUSTOMERS TO CONTRACTUALLY AGREE TO NOTICE REQUIREMENTS THAT DIFFER FROM THOSE SPECIFIED BY THE COMMISSION.

As discussed above, the Proposed Decision and proposed General Order 96-B, Industry Rule 5.3, require that URF carriers that offer detariffed services provide 30-day notice to customers prior to any rate increase or more restrictive term or condition.[22] The Proposed Decision similarly requires an URF carrier that incorporates by reference rates, terms or conditions into a term contract for detariffed services "to provide 30-day notice

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[20] In the same paragraph on page 47, the Proposed Decision states that "we do not believe that notice of rate decreases to consumers is necessary."

[21] *Id.* at 70-71.

[22] *Id.* at 46-47, 72 (Conclusion of Law 23); Proposed Decision of Commissioner Chong Adopting Telecommunications Industry Rules, Appdx. A, p. 7.

to its customers of any increase to rates, or more restrictive terms or conditions . . . ."[23] Additionally, proposed General Order 96-B, Industry Rule 5.3, specifies the means by which notice may be given ("a combination . . . of bill inserts, notices printed on bills; or separate notices sent by first-class mail (or by e-mail to a customer who receives bills from the carrier by e-mail)").[24] These proposed notice requirements should be modified to allow carriers and their business customers to contractually agree to requirements that differ from the Commission's.

In today's competitive market, carriers and business customers should be free to establish the terms applicable to their business relationship unimpeded by unnecessary regulatory rules. Indeed, a fundamental underpinning of the URF Decision is to allow competitive market forces to operate without unnecessary regulatory interference. It makes no sense for the Commission to interfere with the contract negotiating process between a carrier and a business customer by foreclosing the opportunity for the parties to agree to notice requirements that differ from the Commission's requirements. While the Proposed Decision characterizes its notice requirements as a consumer "safeguard," those notice requirements cease to function as a safeguard when a business customer and a service provider are willing to mutually agree to a different arrangement. In such cases, the parties should be afforded the opportunity to contractually agree on when and how notice will be provided. The Proposed Decision should be modified accordingly.

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[23] Proposed Decision, p. 38. *See also id.* at 47, 70-71 (Conclusion of Law 13).

[24] Proposed Decision of Commissioner Chong Adopting Telecommunications Industry Rules, Appdx. A, p. 7.

VIII. THE PROPOSED DECISION SHOULD BE MODIFIED TO ACKNOWLEDGE THAT THE TIER 1 ADVICE LETTER PROCESS WILL BE AVAILABLE FOR CHANGES TO BASIC SERVICE, EFFECTIVE JANUARY 1, 2009.

The Proposed Decision orders an URF Carrier to file an advice letter pursuant to General Rule 7.3.3 (Tier 1 treatment) under General Order 96-B for "[c]hanges to retail service offerings other than basic service."[25] While this requirement may reflect pricing flexibility constraints on basic service today, the Proposed Decision should be modified to acknowledge that this requirement will need modification to accommodate changes that will occur in the future pursuant to the URF Decision. For example, the URF Decision held that "[p]rice caps on basic residential services that are not subsidized by CHCF-B shall be *automatically lifted* on January 1, 2009."[26] To comply with the URF Decision, the Proposed Decision should add a provision automatically eliminating the restriction on the use of the Tier 1 process for basic service, effective January 1, 2009.

IX. CONCLUSION

The Commission's vision for this proceeding was to establish a uniform regulatory framework for California's telecommunications carriers that was compatible with the richly competitive marketplace for telecommunications services. With the few modifications and clarifications described in these Comments, the Proposed Decision advances the Commission's vision. For all of the reasons set forth above, the Proposed Decision should be corrected to reflect the changes discussed herein and set forth in the Attachment to these Comments.

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[25] Proposed Decision, p. 73 (Ordering Paragraph 1).
[26] D.06-08-030, *mimeo*, p. 280 (Ordering Paragraph 3) (emphasis added).

Dated: August 13, 2007

Respectfully submitted,

By: /s/
Michael D. Sasser

Michael D. Sasser
Gregory L. Castle
525 Market Street, 20th Floor
San Francisco, California 94105
Phone: (415) 778-1481
Fax: (415) 974-1999
E-mail: michael.sasser@att.com

Attorneys for Pacific Bell Telephone Company

APPENDIX

RECOMMENDED MODIFICATIONS TO THE PROPOSED DECISION'S FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDERING PARAGRAPHS

[Note: Additions are underlined and deletions are in strikeout text.]

Modifications To The Proposed Decision's Findings Of Fact

[Modification related to the issue in Section II of AT&T California's Comments on the Proposed Decision]:

> [**New Finding of Fact** (if the Commission does not intend to apply the Tier 1 advice letter process to flexibly priced services outside the scope of Phase 1 of this proceeding):]
>
> Advice letter procedures in effect prior to the URF Decision for ILEC flexibly priced services that were beyond the scope of Phase 1 of this proceeding provided more flexibility than Tier 2 and Tier 3 procedures in GO 96-B. Those services should remain subject to the advice letter procedures applicable to them prior to the URF Decision.

[Modification related to the issue in Section V of AT&T California's Comments on the Proposed Decision]:

> **Finding of Fact 20 should be modified as follows:**
>
> We adopt new rules for carriers that seek to detariff to satisfy the requirements of Pub. Util. Code Section 495.7(c)(1) and (2). In particular, we require carriers that detariff services to make available, at no cost, to the consumer information that is substantially equivalent to information previously contained in their tariffs by posting the rates, terms and conditions for detariffed services on their publicly available websites and providing a toll-free number for consumers to call to obtain a copy of rates, terms and conditions. We also require that carriers archive this information for three years, and make this archived information available to the public at no cost upon request.

[Modification related to the issue in Section IV of AT&T California's Comments on the Proposed Decision]:

> **Finding of Fact 35 should be modified as follows:**
>
> Carriers may not detariff obligations pursuant to existing Carrier of Last Resort obligations or obligations that are mandated by state or federal

law to be included in tariffs~~, including Carrier of Last Resort obligations~~.

Modifications To The Proposed Decision's Conclusions Of Law

[Modification related to the issue in Section II of AT&T California's Comments on the Proposed Decision]:

[New Conclusion of Law (if the Commission does not intend to apply the Tier 1 advice letter process to flexibly priced services outside the scope of Phase 1 of this proceeding)**:]**

For advice letter filings relating to flexibly priced services beyond the scope of Phase 1 of this proceeding, the advice letter procedures applicable to those services prior to the URF Decision should continue to apply.

[Modification related to the issue in Sections VI and VII of AT&T California's Comments on the Proposed Decision]:

Conclusion of Law 13 should be modified as follows:

Carriers that enter into a term contract (with early termination fees) with a consumer for detariffed services shall not unilaterally ~~change~~ increase rates, or apply more restrictive terms, or conditions to the term contract unless the carrier has provided the customer 30-day notice and received consumer consent for the new rates, terms, and conditions. The 30-day notice requirement does not apply in cases where a carrier and a business service customer contractually agree to different notice requirements.

[Modification related to the issue in Section IV of AT&T California's Comments on the Proposed Decision]:

Conclusion of Law 21 should be modified as follows:

Detariffing of existing Carrier of Last Resort obligations or obligations mandated by ~~pursuant to~~ existing state or federal law to be included in tariffs ~~(such as Carrier of Last Resort obligations)~~ is not in the public interest or lawful.

[Modification related to the issue in Sections VII of AT&T California's Comments on the Proposed Decision]:

Conclusion of Law 23 should be modified as follows:

Once a service is detariffed, the carrier need not file anything further with the Commission regarding the detariffed service, such as advice letters regarding rate changes or changes to terms and conditions. The carrier also does not need to file the contract for the detariffed service. The carrier must continue to notify a customer 30 days in advance of increased rates, or more restrictive terms and conditions for detariffed services and must post all available information on its website. The 30-day notice requirement does not apply in cases where a carrier and a business service customer contractually agree to different notice requirements.

Modifications To The Proposed Decision's Ordering Paragraphs

[Modification related to the issue in Section II of AT&T California's Comments on the Proposed Decision]:

[New Ordering Paragraph (if the Commission does not intend to apply the Tier 1 advice letter process to flexibly priced services outside the scope of Phase 1 of this proceeding)**:]**

Advice letters of URF ILECs related to flexibly priced services beyond the scope of Phase 1 of this proceeding shall continue to be governed by the advice letter procedures that applied to those services prior to the URF Decision.

[Modification related to the issue in Section VIII of AT&T California's Comments on the Proposed Decision]:

Ordering Paragraph 1a. should be modified as follows:

On or 30 days after the effective date of this decision, an URF Carrier shall file an advice letter for the following services pursuant to General Rule 7.3.3 (Tier 1 treatment) under General Order 96-B:

a. Changes to retail service offerings other than basic service; changes to basic service shall be allowed Tier 1 treatment beginning January 1, 2009

[Modification related to the issue in Section IV of AT&T California's Comments on the Proposed Decision]:

Ordering Paragraph 3 should be modified as follows:

Within the next 18 months, a carrier may detariff existing retail services and tariff sheets for those services by filing an advice letter that complies with the terms of General Order 96-B, General Rule 7.3.4, and does not purport to cancel:

…

f. A tariff containing obligations as a Carrier of Last Resort or other obligations mandated by ~~under~~ state ~~and~~ or federal law to be included in tariffs.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing document, **"COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA (U 1001 C) ON THE PROPOSED DECISION OF COMMISSIONER CHONG CONSOLIDATING PROCEEDINGS, CLARIFYING RULES FOR ADVICE LETTERS UNDER THE UNIFORM REGULATORY FRAMEWORK, AND ADOPTING PROCEDURES FOR DETARIFFING,"** to be served on all known parties to R.05-04-005 and R.98-07-038 who have e-mail addresses. Any party on the Appearance or State Service list that has not provided the Commission an electronic mail address was served by first-class mail, a copy properly addressed to each party.

Executed at San Francisco, California on the 13th day of August 2007.

/s/

Linda Cheng
AT&T Services, Inc.
525 Market Street, 20th Floor
San Francisco, CA 94105

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

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Last changed: August 9, 2007

Appearance

HARRY GILDEA
SNAVELY KING MAJOROS O'CONNOR & LEE INC.
1111 14TH STREET NW
WASHINGTON, DC 20005

RICHARD B. LEE
SNAVELY KING & MAJOROS O'CONNOR &LEE INC
1111 14TH STREET NW
WASHINGTON, DC 20005

MICHELE F. JOY
GENERAL COUNSEL
ASSOCIATION OF OIL PIPE LINES
1101 VERMONT AVENUE N.W. STE 604
WASHINGTON, DC 20005-3521

KIM LOGUE
REGULATORY ANALYST
LCI INTERNATIONAL TELECOM CORP.
4250 N. FAIRFAX DRIVE, 12W002
ARLINGTON, VA 22203

TERRANCE A. SPANN
U. S. ARMY LEGAL SERVICES AGENCY
REGULATORY LAW OFFICE JALS-RL
901 N. STUART STREET, SUITE 700
ARLINGTON, VA 22203

CECIL O. SIMPSON, JR.
US ARMY LEGAL SERVICES AGENCY
901 NORTH STUART STREET, SUITE 713
ARLINGTON, VA 22203-1837

ROBERT A. SMITHMIDFORD
VICE PRESIDENT
BANK OF AMERICA
8011 VILLA PARK DRIVE
RICHMOND, VA 23228-2332

HUGH COWART
BANK OF AMERICA TECHNOLOGY & OPERATIONS
FL9-400-01-10
9000 SOUTHSIDE BLVD, BUILDING 400 1ST FL
JACKSONVILLE, FL 32256

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
CITIZENS/FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

MICHAEL BROSCH
UTILITECH INC.
740 NORTH BLUE PARKWAY, STE. 204
LEE'S SUMMIT, MO 64086

ANN JOHNSON
VERIZON
HQE02F61
600 HIDDEN RIDGE
IRVING, TX 75038

ROBIN BLACKWOOD
ATTORNEY AT LAW
VERIZON
600 HIDDEN RIDGE, HQE 03H29
IRVING, TX 75038

ROBBIE RALPH
DIRECTOR, ECONOMIC REGULATION & TARIFF
SHELL CALIFORNIA PIPELINE COMPANY LLC
PO BOX 2648
HOUSTON, TX 77252-2648

ANNA M. SANCHOU
GENERAL MANAGER - NETWORK REGULATORY
SOUTHWESTERN BELL MESSAGING SERVICES INC
5800 NW PARKWAY, STE. 125
SAN ANTONIO, TX 78249

REX KNOWLES
REGIONAL VICE PRESIDENT
XO COMMUNICATIONS SERVICES, INC.
111 EAST BROADWAY, SUITE 1000
SALT LAKE CITY, UT 84111

EDWARD B. GIESEKING
DIRECTOR/PRICING AND TARIFFS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150

VALERIE J. ONTIVEROZ
SOUTHWEST GAS CORPORATION
PO BOX 98510
LAS VEGAS, NV 89193-8510

NIKAYLA K. NAIL THOMAS
EXECUTIVE DIRECTOR
CALTEL
515 S. FLOWER STREET, 47/F
LOS ANGELES, CA 90071

JERRY R. BLOOM
ATTORNEY AT LAW
WINSTON & STRAWN LLP
333 SOUTH GRAND AVENUE, 38TH FLOOR
LOS ANGELES, CA 90071-1543

ROBERT J. DIPRIMIO
VALENCIA WATER COMPANY
24631 AVENUE ROCKEFELLER
VALENCIA, CA 91355

DON EACHUS
VERIZON CALIFORNIA, INC.
CA501LB
112 S. LAKE LINDERO CANYON ROAD
THOUSAND OAKS, CA 91362

JESUS G. ROMAN
ATTORNEY AT LAW
VERIZON ACCESS TRANSMISSION SERVICES
112 S. LAKEVIEW CANYON ROAD, CA501LB
THOUSAND OAKS, CA 91362

MICHAEL A. BACKSTROM
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

ROLAND S. TANNER
SOUTHERN CALIFORNIA WATER COMPANY
PO BOX 9016
SAN DIMAS, CA 91773

PAUL A. SZYMANSKI
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET
SAN DIEGO, CA 92101

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105

PETER M. DITO
KINDER MORGAN ENERGY PARTNERS
1100 TOWN AND COUNTRY ROAD
ORANGE, CA 92868

MIKE MULKEY
ARRIVAL COMMUNICATIONS
1807 19TH STREET
BAKERSFIELD, CA 93301

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

DIANE I. FELLMAN
FPL ENERGY PROJECT MANAGEMENT, INC.
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN
ATTORNEY AT LAW
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

KRISTIN L. JACOBSON
SPRINT NEXTEL
201 MISSION STREET, SUITE 1400
SAN FRANCISCO, CA 94102

MICHEL PETER FLORIO
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

REGINA COSTA
RESEARCH DIRECTOR
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

RUDOLPH M. REYES
ATTORNEY AT LAW
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

THOMAS J. LONG
ATTORNEY AT LAW
OFFICE OF THE CITY ATTORNEY
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102

WILLIAM NUSBAUM
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

LAURA E. GASSER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MONICA L. MCCRARY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5134
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE WALES
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THOMAS A. DOUB
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HEIDI SIECK WILLIAMSON
DEPT OF TELECOMMUNICATIONS & INFORMATION
CITY & COUNTY OF SAN FRANCISCO
875 STEVENSON STREET, 5TH FLOOR
SAN FRANCISCO, CA 94103

STEPHEN B. BOWEN
ATTORNEY AT LAW
BOWEN LAW GROUP
235 MONTGOMERY STREET, SUITE 920
SAN FRANCISCO, CA 94104

ANN KIM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

DAVID DISCHER
ATTORNEY AT LAW
PACIFIC BELL TELEPHONE COMPANY
525 MARKET STREET, RM. 2027
SAN FRANCISCO, CA 94105

EMERY G. BORSODI
DIRECTOR RATES & REG. RELATIONS
AT&T CALIFORNIA
525 MARKET ST., RM. 1921
SAN FRANCISCO, CA 94105

ERINN R.W. PUTZI
THE STRANGE LAW FIRM, PC
282 SECOND STREET, SUITE 201
SAN FRANCISCO, CA 94105

FASSIL T. FENIKILE
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1925
SAN FRANCISCO, CA 94105

GREGORY L. CASTLE
SENIOR ATTORNEY
AT&T CALIFORNIA
525 MARKET STREET, SUITE 2022
SAN FRANCISCO, CA 94105

GWEN JOHNSON
C/O AT&T CALIFORNIA
525 MARKET STREET, 18TH FLOOR, 6
SAN FRANCISCO, CA 94105

JADINE LOUIE
REGULATORY SERVICES
SBC CALIFORNIA
ASSOCIATE DIRECTOR
525 MARKET ST., 19FL, 7
SAN FRANCISCO, CA 94105

JAMES YOUNG
GENERAL ATTORNEY & ASSIST. GENERAL COUN
AT&T CALIFORNIA
525 MAKRET STREET, SUITE 1904
SAN FRANCISCO, CA 94105

JOHN P. CLARKE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MCB10C
SAN FRANCISCO, CA 94105

MARY E. WAND
ATTORNEY AT LAW
MORRISON & FOERSTER LLP
425 MARKET STREET
SAN FRANCISCO, CA 94105

MICHAEL D. SASSER
GENERAL ATTORNEY
PACIFIC BELL (AT&T CALIFORNIA)
525 MARKET ST., RM. 2021
SAN FRANCISCO, CA 94105

NEDYA CAMPBELL
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR
SAN FRANCISCO, CA 94105

NELSONYA CAUSBY
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET ST., STE 2025
SAN FRANCISCO, CA 94105

PAUL P. STRANGE
ATTORNEY AT LAW
THE STRANGE LAW FIRM
282 SECOND STREET, SUITE 201
SAN FRANCISCO, CA 94105

PHUONG N. PHAM
MORRISON & FOERSTER
425 MARKET STREET
SAN FRANCISCO, CA 94105

STEPHEN H. KUKTA
COUNSEL
SPRINT NEXTEL
201 MISSION STREET, STE. 1400
SAN FRANCISCO, CA 94105

THOMAS SELHORST
AT&T CALIFORNIA
525 MARKET STREET, RM. 2023
SAN FRANCISCO, CA 94105

MARILYN H. ASH
U.S. TELEPACIFIC CORP.
620/630 3RD ST.
SAN FRANCISCO, CA 94107

PETER A. CASCIATO
ATTORNEY AT LAW
PETER A. CASCIATO P.C.
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107

CHERYL HILLS
ICG COMMUNICATIONS, INC.
620 3RD ST
SAN FRANCISCO, CA 94107-1902

ARTHUR D. LEVY
639 FRONT STREET, 4TH FLOOR
SAN FRANCISCO, CA 94111

CARL K. OSHIRO
ATTORNEY AT LAW
CSBRT/CSBA
100 PINE STREET, SUITE 3110
SAN FRANCISCO, CA 94111

DAVID A. SIMPSON
SIMPSON PARTNERS
900 FRONT STREET
SAN FRANCISCO, CA 94111

E. GARTH BLACK
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JAMES M. TOBIN
ESQUIRE
TWO EMBARCADERO CENTER, SUITE 1800
SAN FRANCISCO, CA 94111

JEANNE B. ARMSTRONG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JEFFREY F. BECK
ATTORNEY AT LAW
COOPER, WHITE & COOPER ,L.L.P.
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

MARGARET L. TOBIAS
MANDELL LAW GROUP, PC
THREE EMBARCADERO CENTER, SIXTH FL.
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

MICHAEL B. DAY
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL
COOPER WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

SARAH DEYOUNG
EXECUTIVE DIRECTOR
CALTEL
50 CALIFORNIA STREET, SUITE 1500
SAN FRANCISCO, CA 94111

SARAH E. LEEPER
STEEFEL LEVITT & WEISS PC
1 EMBARCADERO CENTER 29TH FLOOR
SAN FRANCISCO, CA 94111

THOMAS J. MACBRIDE, JR.
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

MARTIN A. MATTES
ATTORNEY AT LAW
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799

EDWARD W. O'NEILL
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

SUZANNE TOLLER
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

THOMAS HAMMOND
REAL TELEPHONE COMPANY
PO BOX 640410
SAN FRANCISCO, CA 94164-0410

EARL NICHOLAS SELBY
ATTORNEY AT LAW
LAW OFFICES OF EARL NICHOLAS SELBY
418 FLORENCE STREET
PALO ALTO, CA 94301

TERRY L. MURRAY
MURRAY & CRATTY
8627 THORS BAY ROAD
EL CERRITO, CA 94530

RICHARD M. HAIRSTON
R.M. HAIRSTON COMPANY
1112 LA GRANDE AVENUE
NAPA, CA 94558-2168

BETSY STOVER GRANGER
PACIFIC BELL WIRELESS
4420 ROSEWOOD DRIVE, 4TH FLOOR
PLEASANTON, CA 94588

DOROTHY CONNELLY
DIRECTOR, GOVERNMENT RELATIONS
AIRTOUCH COMMUNICATIONS, INC.
2999 OAK RD 5
WALNUT CREEK, CA 94597-2066

MARCO GOMEZ
ATTORNEY AT LAW
S.F. BAY AREA RAPID TRANSIT
PO BOX 12688
OAKLAND, CA 94604-2688

DOUGLAS GARRETT
COX COMMUNICATIONS
2200 POWELL STREET, STE. 1035
EMERYVILLE, CA 94608

DOUG GARRETT
SENIOR DIRECTOR, GOVERNMENT AFFAIRS
ICG COMMUNICATIONS, INC.
180 GRAND AVENUE, STE 800
OAKLAND, CA 94612

GLENN SEMOW
CALIFORNIA CABLE & TELECOMM. ASSOC.
360 22ND STREET, STE. 750
OAKLAND, CA 94612

LESLA LEHTONEN
VP LEGAL AND REGULATORY AFFAIRS
CALIFORNIA CABLE & TELECOM ASSOCIATION
360 22ND STREET, SUITE 750
OAKLAND, CA 94612

MARIA POLITZER
CALIFORNIA CABLE & TELECOM ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

REED V. SCHMIDT
VICE PRESIDENT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

MELISSA W. KASNITZ
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

ROGER HELLER
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

PALLE JENSEN
DIRECTOR OF REGULATORY AFFAIRS
SAN JOSE WATER COMPANY
374 WEST SANTA CLARA STREET
SAN JOSE, CA 95196

RICHARD J. BALOCCO
PRESIDENT
CALIFORNIA WATER ASSOCIATION
374 W. SANTA CLARA STREET
SAN JOSE, CA 95196

SCOTT CRATTY
MURRAY & CRATTY, LLC
725 VICHY HILLS DRIVE
UKIAH, CA 95482

CHARLES BORN
MANAGER, GOVERNMENT & EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS OF CALIFORNIA
9260 E. STOCKTON BLVD.
ELK GROVE, CA 95624

JOSEPH CHICOINE
MANAGER, GOVERNMENT & EXTERNAL AFFAIRS
9260 E. STOCKTON BLVD.
ELK GROVE, CA 95624

GREG R. GIERCZAK
EXECUTIVE DIRECTOR
SURE WEST TELEPHONE
PO BOX 969
200 VERNON STREET
ROSEVILLE, CA 95678

CHARLES E. BORN
MANAGER-STATE GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS TELECOMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

ANDREW BROWN
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95811

CHRIS BROWN
EXECUTIVE DIRECTOR
CALIFORNIA URBAN WATER CONSERVATION
455 CAPITOL MAIL, SUITE 703
SACRAMENTO, CA 95814

DAVID HADDOCK
DIRECTOR, REGULATORY
01 COMMUNICATIONS, INC.
1515 K STREET, SUITE 100
SACRAMENTO, CA 95814

R. KEENAN DAVIS
GENERAL COUNSEL
01 COMMUNICATIONS, INC.
1515 K STREET, SUITE 100
SACRAMENTO, CA 95814

SHEILA DEY
WESTERN MANUFACTURED HOUSING COMMUNITIES
455 CAPITOL MALL STE 800
SACRAMENTO, CA 95814

TOM ECKHART
CAL - UCONS, INC.
10612 NE 46TH STREET
KIRKLAND, WA 98033

GREGORY J. KOPTA
DAVIS WRIGHT TREMAINE, LLP
1201 THIRD AVENUE, SUITE 2200
SEATTLE, WA 98101-3045

ANDREW O. ISAR
DIRECTOR, INDUSTRY RELATIONS
TELECOMMUNICATIONS RESELLERS ASSN.
7901 SKANSIE AVE 240
GIG HARBOR, WA 98335

Information Only

MICHAEL R. ROMANO
ATTORNEY AT LAW
LEVEL 3 COMMUNICATIONS, LLC
2300 CORPORATE PARK DR. STE 600
HERNDON, VA 20171-4845

KELLY FAUL
SENIOR MANAGER
1111 SUNSET HILLS DRIVE
RESTON, VA 20190

WILLIAM H. WEBER
ATTORNEY AT LAW
CBEYOND COMMUNICATIONS
320 INTERSTATE NORTH PARKWAY
ATLANTA, GA 30339

DONALD M. JOHNSON
CHIEF OPERATING OFFICER
FULL POWER CORPORATION
2130 WATERS EDGE DR.
WESTLAKE, OH 44135-6602

KATHERINE K. MUDGE
ATTORNEY AT LAW
COVAD COMMUNICATIONS COMPANY
7000 NORTH MOPAC EXPRESSWAY, 2ND FLOOR
AUSTIN, TX 78731

JEFF WIRTZFELD
REGULATORY CONTACT
QWEST COMMUNICATION CORPORATION
1801 CALIFORNIA STREET, SUITE 4700
DENVER, CO 80202

MARJORIE O. HERLTH
QWEST COMMUNICATIONS CORPORATION
1801 CALIFORNIA ST., SUITE 4700
DENVER, CO 80202

GREGORY T. DIAMOND
7901 LOWRY BLVD.
DENVER, CO 80230

ALOA STEVENS
FRONTIER, A CITIZENS COMMUNICATIONS CO.
299 S MAIN ST STE 1700
SALT LAKE CITY, UT 84111-2279

AARON THOMAS
AES NEWENERGY, INC.
350 S. GRAND AVENUE, SUITE 2950
LOS ANGELES, CA 90071

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA AND MORTON, LLP
444 SOUTH FLOWER STREET, NO. 1500
LOS ANGELES, CA 90071

JANE DELAHANTY
U.S. TELEPACIFIC CORP.
515 S. FLOWER STREET, 47TH FLOOR
LOS ANGELES, CA 90071-2201

JACQUE LOPEZ
LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, RM 321
ROSEMEAD, CA 91770

ALLEN K. TRIAL
COUNSEL
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12D
SAN DIEGO, CA 92101

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

CARL C. LOWER
UTILITY SPECIALISTS
717 LAW STREET
SAN DIEGO, CA 92109-2436

STEVE LAFOND
PUBLIC UTILITIES DEPARTMENT
CITY OF RIVERSIDE
2911 ADAMS STREET
RIVERSIDE, CA 92504

DONALD H. MAYNOR
ATTORNEY AT LAW
235 CATALPA DRIVE
ATHERTON, CA 94027

JUDY PECK
SEMPRA ENERGY UTILITIES
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102

MARZIA ZAFAR
SAN DIEGO GAS & ELECTRIC/SOCAL GAS
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102

ANNA KAPETANAKOS
SENIOR COUNSEL
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2024
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

MARILYN H. ASH
U.S. TELEPACIFIC CORP.
620/630 3RD ST.
SAN FRANCISCO, CA 94107

NANCY E. LUBAMERSKY
VICE PRESIDENT
U.S. TELEPACIFIC CORP.
620/630 3RD ST.
SAN FRANCISCO, CA 94107

MARK LYONS
SIMPSON PARTNERS LLP
SUITE 1800
TWO EMBARCADERO CENTER
SAN FRANCISCO, CA 94111

VINCE VASQUEZ
SENIOR FELLOW, TECHNOLOGY STUDIES
PACIFIC RESEARCH INSTITUTE
755 SANSOME STREET, SUITE 450
SAN FRANCISSCO, CA 94111

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

TREG TREMONT
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

ALLEN S. HAMMOND, IV
PROFESSOR OF LAW
SANTA CLARA UNIVERSITY SHCOOL OF LAW
500 EL CAMINO REAL
SANTA CLARA, CA 94305

STAFF COUNSEL
CONSUMER FEDERATION OF CALIFORNIA
520 EL CAMINO REAL, STE 340
SAN MATEO, CA 94402

ALEXIS K. WODTKE
STAFF ATTORNEY
CONSUMER FEDERATION OF CALIFORNIA
520 S. EL CAMINO REAL, STE. 340
SAN MATEO, CA 94402

JOHN DUTCHER
VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875

LOU FILIPOVICH
15376 LAVERNE DRIVE
SAN LEANDRO, CA 94579

JOHN R. GUTIERREZ
COMCAST PHONE OF CALIFORNIA, LLC
12647 ALCOSTA BLVD., SUITE 200
SAN RAMON, CA 94583

JOANN RICE
REGULATORY MANAGER
SBC LONG DISTANCE
5850 W. LAS POSITAS BLVD.
PLEASANTON, CA 94588

ANITA C. TAFF-RICE
ATTORNEY AT LAW
1547 PALOS VERDES MALL, SUITE 298
WALNUT CREEK, CA 94597

LEON M. BLOOMFIELD
ATTORNEY AT LAW
WILSON & BLOOMFIELD, LLP
1901 HARRISON STREET, SUITE 1620
OAKLAND, CA 94612

SHELLEY BERGUM
DEAF & DISABLED TELECOMMUNICATIONS PRGRM
505 14TH STREET, SUITE 400
OAKLAND, CA 94612-3532

TIMOTHY S. GUSTER
GENERAL COUNSEL
GREAT OAKS WATER COMPANY
PO BOX 23490
SAN JOSE, CA 95153

RICHARD H. LEVIN
ATTORNEY AT LAW
6741 SEBASTOPOL AVE STE 230
SEBASTOPOL, CA 95472-3838

ALEXANDRA HANSON
DIRECTOR PROVISIONING
01 COMMUNICATIONS, INC.
1515 K STREET, SUITE 100
SACRAMENTO, CA 95814

SCOTT BLAISING
ATTORNEY AT LAW
BRAUN & BLAISING, P.C.
915 L STREET, STE. 1270
SACRAMENTO, CA 95814

SHEILA HARRIS
MANAGER, GOVERNMENT AFFAIRS
INTEGRA TELECOM HOLDINGS, INC.
1201 NE LLOYD BLVD., STE.500
PORTLAND, OR 97232

ADAM L. SHERR
ATTORNEY AT LAW
QWEST COMMUNICATIONS CORPORATION
1600 7TH AVENUE, 3206
SEATTLE, WA 98191-0000

State Service

DANIEL R. PAIGE
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

CHARLES H. CHRISTIANSEN
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHERRIE CONNER
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DANILO E. SANCHEZ
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH
ROOM 3200
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONALD J. LAFRENZ
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FE N. LAZARO
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FRED L. CURRY
CALIF PUBLIC UTILITIES COMMISSION
WATER ADVISORY BRANCH
ROOM 3106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HELEN M. MICKIEWICZ
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5123
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JACQUELINE A. REED
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5017
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JAMES SIMMONS
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANE WHANG
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5029
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JEORGE S. TAGNIPES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOHN E. THORSON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5112
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KARIN M. HIETA
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KARL BEMESDERFER
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVENUE, ROOM 5006
SAN FRANCISCO, CA 94102-3214

LEE-WHEI TAN
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
505 VAN NESS AVENUE, AREA 3-D
SAN FRANCISCO, CA 94102-3214

MICHAEL C. AMATO
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
ROOM 3203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL D. MCNAMARA
CALIF PUBLIC UTILITIES COMMISSION
CARRIER BRANCH
ROOM 3207
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE BILLINGSLEY
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PHILLIP ENIS
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER ISSUES ANALYSIS BRANCH
ROOM 2101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD FISH
CALIF PUBLIC UTILITIES COMMISSION
LICENSING TARIFFS, RURAL CARRIERS & COST
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD SMITH
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5019
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT M. POCTA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RUDY SASTRA
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SIMIN LITKOUHI
CALIF PUBLIC UTILITIES COMMISSION
POLICY & DECISION ANALYSIS BRANCH
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEVEN KOTZ
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2251
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SUE WONG
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY J. SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5212
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WILLIAM JOHNSTON
CALIF PUBLIC UTILITIES COMMISSION
POLICY & DECISION ANALYSIS BRANCH
AREA 3-F
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WADE MCCARTNEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814